

Admitted in Indiana  
and Michigan

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November 25, 1992

Mr. David Novak,  
Community Relations Coordinator  
Office of Public Affairs  
PS-19 J  
U.S. EPA Region V  
77 W. Jackson Blvd.  
Chicago, IL 60604

Re: Himco Superfund Site - Elkhart, Indiana

Dear Mr. Novak:

As counsel for Adams & Westlake, LTD., I am writing in support of the comments on the U.S. EPA's proposed plan at the above site which were submitted by Miles, Inc.

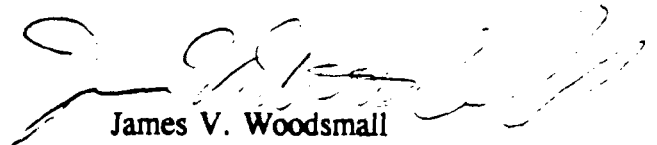
The waste materials at this site are already encapsulated between layers of calcium sulfate. The effectiveness of the encapsulation is evident by the lack of groundwater contamination even though waste has been on the site for 32 years without impacting the groundwater. In addition, the downgradient residents are served by municipal water, therefore there is no future risk to the persons most directly impacted by the site. Any risk to these residents does not emanate from the site but as the U.S. EPA has stated in the R.I. report, Volume V, at 5-14 "virtually all this risk, however, is attributable either to chemicals not detected ... or to chemicals attributable to upgradient or background sources."

The clay cap contained in the EPA preferred alternative will have a negative impact on the site by permanently removing natural vegetation and by inhibiting bioremediation which reduces the toxicity of the site contaminants.

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We urge you to accept the comments of Miles, Inc. and to adopt the no action alternative and also accept Miles' offer to install a fence and conduct periodic monitoring of the site. We request that this letter of support be included in the administrative record for this site.

Respectfully,



James V. Woodsmall

JVW/mj

cc: Leroy Ott  
Reed Oslan

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